



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, ILLINOIS 60604**

**DATE:** **JAN 29 2018**  
**SUBJECT:** CLEAN AIR ACT INSPECTION REPORT  
Avery Dennison Bldg 3 and 5, Painesville, Ohio  
**FROM:** Shilpa Patel, Environmental Engineer  
AECAB (MN/OH)  
**THRU:** Brian Dickens, Section Chief  
AECAB (MN/OH)  
**TO:** File

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**BASIC INFORMATION**

**Facility Name:** Avery Dennison, Performance Tapes and Materials Group

**Facility Location:** 250 Chester Street, Painesville, Ohio (Building 3 and 5)

**Date of Inspection:** 8/15/17

**EPA Inspector(s):**

1. Shilpa Patel, Environmental Engineer
2. Greg Gehrig, Environmental Engineer

**Other Attendees**

1. Dan Jones, Environmental Compliance Manager (Building 5)
2. Mike Greci, Plant Manager, Performance Tapes (Building 5)
3. Dominic Bosi, Sr. EHS Manager, Performance Tapes (Building 5)
4. Chelsea Sasse, EHS Manager, Materials Group (Building 3)
5. Shawn Larson, Coating Business Unit Manager, Material Group (Building 3)
6. Mike Varcho, Technical & Process Manager, Materials Group (Building 3)

**Purpose of Inspection:** Inspection of the air pollution capture systems

**Facility Type:** Manufacturer and distributor of pressure-sensitive adhesive materials

**Regulations Central to Inspection:** National Emission Standards for Hazardous Air Pollutants: Paper and Other Web Coating (40 C.F.R. Part 63, Subpart JJJJ)

**Arrival Time:** 7:45 AM

**Departure Time:** 1:15 PM

**Inspection Type:**

- ☒ Unannounced Inspection
- ☐ Announced Inspection

**OPENING CONFERENCE**

- ☒ Credentials Presented
- ☒ CBI warning to facility provided

The following information was obtained verbally from Dan Jones and/or Dominic Bosi unless otherwise noted.

**Process Description:**

Building 5 and 6: Performance Tapes and Pilot

~260 employees and operates 24 hours/7 days a week.

The remaining process description was claimed confidential business information (CBI) by the company.

Building 3: Material Group

~148 employees and operates 24 hours/7 days a week.

The remaining process description was claimed CBI by the company.

**TOUR INFORMATION**

**EPA toured the facility:** Yes

**Data Collected and Observations:**

Building 5

I-1 was running. The facility does a manual pressure test on the coating process and has pressure monitors on the ovens. The ovens' emissions are routed to the control device through a differential speed fan. The speed of the fan is automatically adjusted based on the pressure seen by the monitors. EPA observed uncaptured volatile organic emissions (VOC) from the ovens through the IR camera.

I-2 was operating during the tour. EPA observed uncaptured VOC from the ovens through the IR camera.

I-3 was not operating during the tour.

I-5 was operating during the tour. EPA observed the oven door (J-5) in this zone to be slightly open due to something being stuck in the door. EPA observed uncaptured VOCs from the ovens through the IR camera.

Additional data and observations descriptions were claimed CBI by the company.

### Building 3

P-4 was operating during the tour. EPA imaged the coating booth but did not record video. A picture was taken of the coating booth. A 55-gallon drum containing the adhesive was located outside the booth enclosure. IR Camera footage was recorded of the drum along with a photoionizing detector (PID) reading. Infrared (IR) camera footage was recorded at the oven air intake (fresh air) and the air fan draw from the adhesive booth which pulls air from the coating booth. EPA observed uncaptured VOCs from the ovens and the drum through the IR camera.

P-5 was operating during the tour.

P-7 was operating during the tour. A 55-gallon drum containing the adhesive was located outside the enclosure. A PID was reading was recorded at the drum. EPA observed uncaptured VOCs from the ovens and the drum through the IR camera.

The temperatures at the thermal oxidizers (TOXs) were 1602 °F and 1579 °F at TOX #3 and TOX #4, respectively.

Additional data and observations descriptions were claimed CBI by the company.

**Photos and/or Videos:** were taken during the inspection.

**Field Measurements:** were taken during this inspection.

### RECORDS REVIEW

No record review conducted on-site.

### CLOSING CONFERENCE

#### **Requested documents:**

- Most recent permanent total enclosure testing
- 12 months of regeneration thermal oxidizer (RTO) and TOX temperature readings

**Concerns:** EPA stated that there were several areas on the coating lines where volatile organic emissions were not captured by the permanent total enclosure.

### SIGNATURES

Report Author:

Shuler Paul

Date:

1/23/18

Section Chief:

Brian D. Jones

Date:

1/29/18

**Facility Name:** Avery Dennison (Building 3 and 5)  
**Facility Location:** 250 Chester Street, Painesville, Ohio  
**Date of Inspection:** 8/15/17

**APPENDICES AND ATTACHMENTS**

1. Attachment A: CBI information and data collected during the inspection.
2. Appendix A: FLIR Log (CBI)
3. Appendix B: PID Readings (CBI)